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Case 3:24-cr-00277-MMC

STIP. AND [PROPOSED] ORDER Case No.: 24-CR-277 MMC

Counsel for Luke Brugnara and the United States of America, through undersigned counsel, hereby stipulate and agree that the Order Regarding Defendant's Release, ECF No. 35, and the Conditions of Release and Appearance, ECF No. 38, should be modified as follows: the location restriction set forth in subsection (C) of ECF No. 38 should be removed and a curfew from 7:00 p.m. until 7:00 a.m. should be imposed instead. Any requested changes to the curfew schedule must be directed to and approved by the Court. In addition, Mr. Brugnara must stay away from the Extra Space Storage located at 3601 Junipero Serra Blvd in Daly City, California. All other conditions should remain the same. Counsel for Mr. Brugnara and for the United States have conferred with Pretrial Services, which does not object to the requested modifications.

IT IS SO STIPULATED.

Dated: October 22, 2024

<u>/s/Matthew Dirkes</u>

MATTHEW DIRKES

Counsel for Defendant Luke Brugnara

ISMAIL J. RAMSEY United States Attorney

/s/Ryan Arash Rezaei

RYAN ARASH REZAEI Assistant United States Attorney

STIP. AND [PROPOSED] ORDER Case No.: 24-CR-277 MMC

[PROPOSED] ORDER

Having reviewed the foregoing stipulation and good cause having been shown, it is hereby ordered that the Order Regarding Defendant's Release, ECF No. 35, and the Conditions of Release and Appearance, ECF No. 38, are modified such that the location restriction set forth in subsection (C) of ECF No. 38 is removed and the defendant is instead subject to a curfew from 7:00 p.m. until 7:00 a.m. Any requested changes to the curfew schedule must be directed to and approved by the Court. In addition, the defendant must stay away from the Extra Space Storage located at 3601 Junipero Serra Blvd. in Daly City, California. All other conditions remain the same.

United States District Judge

IT IS SO ORDERED.

|| DATED: October 22, 2024

STIP. AND [PROPOSED] ORDER Case No.: 24-CR-277 MMC